

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

In re Bair Hugger Forced Air Warming
Products Liability Litigation

MDL No. 15-2666 (JNE/DTS)

This Document Relates to All Actions

DECLARATION OF GENEVIEVE M. ZIMMERMAN

1. My name is Genevieve M. Zimmerman and I am a Partner with the Meshbesh & Spence, Ltd. law firm. I am a member of the Court appointed Co-Lead Counsel in the above entitled matter.
2. I submit this declaration in support of Plaintiffs' Motion for Rule 11 Sanctions. Unless otherwise stated, the facts set forth herein are based upon my personal knowledge, information, and belief.
3. Attached hereto as Exhibit A is a true and correct copy of the letter to the Court dated January 30, 2019 from Benjamin W. Hulse regarding an update on the status of the state court Bair Hugger litigation.
4. Attached hereto as Exhibit B is a true and correct copy of the letter to the Court dated January 30, 2019 from Genevieve Zimmerman in response to the letter from Benjamin W. Hulse regarding an update on the status of the state court Bair Hugger litigation.

Dated: July 2, 2019

/s/ Genevieve M. Zimmerman

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